



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
122 S. Front Street
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

CERTIFIED MAIL

OCT 30 2003

Mr. Vinnod Gupta
President
Ohio Cast Products, Inc.
2408 13th St., N.E.
Canton, OH 44705

Re: Proposed Director's Final Findings and Orders for air pollution control law and rule violations

Dear Mr. Gupta:

My staff has informed me of the violations of Ohio Administrative Code Rules 3745-15-07(A) and 3745-17-08(B), Ohio Revised Code § 3704.05(C) and (G), and the terms and conditions of Ohio Cast Products, Inc.'s permit to install for the casting finishing operations associated with the facility located at 2408 13th St., N.E., Canton, Ohio. I also have been informed that Ohio Cast has cooperated with Ohio EPA by correcting the violations once notified by Ohio EPA.

Enclosed is a copy of the proposed Findings and Orders prepared by my staff which includes a provision for the settlement of the claims for civil penalties resulting from Ohio Cast's violations of State air pollution control laws. I am proposing the use of Findings and Orders because this is the most expeditious means of resolving the violations. Because this letter and the attached documents summarize a proposed settlement, I consider them inadmissible for any purpose in any enforcement action the State may take in the event that settlement cannot be finalized.

Please review the attached documents carefully. If Ohio Cast has any questions concerning the proposed Findings and Orders, or would like to arrange a meeting to discuss the proposed Findings and Orders, please contact Eva Brault, Ohio EPA Staff Attorney, at (614) 644-3037. If she does not hear from Ohio Cast within fourteen (14) days of the receipt of this letter concerning its willingness to accept the Findings and Orders as currently written, or with mutually agreed upon modifications, I will consider alternative enforcement mechanisms including referral of the matter to the Ohio Attorney General's Office for legal action.

A copy of Ohio EPA's guidance document on the administrative enforcement process is enclosed for your information and to facilitate your review of the attached Findings and

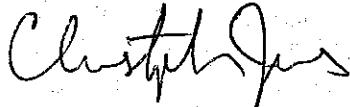
Bob Taft, Governor
Jennette Bradley, Lieutenant Governor
Christopher Jones, Director

Mr. Vinnod Gupta
Ohio Cast Products, Inc.
Page 2 of 2

Orders and your understanding of the Division of Air Pollution Control's administrative enforcement process.

Your prompt attention to this matter will be appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher Jones".

Christopher Jones
Director

xc: Jim Orlemann, DAPC
Tom Kalman, DAPC
Patty Porter, DAPC
Eva Brault, Legal Office
Dan Aleman, Canton LAA
Terri Smith, DAPC (w/o enclosures)
Ohio Cast Products, Statutory Agent

enclosures

CJ:PP:pp

A guide to the...

Administrative Enforcement Process

Within the Division of Air Pollution Control

Introduction

This information sheet has been prepared to help you understand the administrative enforcement process within the Agency. With an understanding of the process and adequate preparation, you can facilitate a prompt resolution of this enforcement action. Included are answers to the questions most frequently asked by parties involved in the administrative enforcement process.

I have been working with the District Office or local air agency inspector to correct the violations. Why is an enforcement action necessary?

The Agency considers the following factors in deciding that an enforcement action is necessary: (1) Ohio EPA needs to obtain civil penalties for your violations; (2) your violations are serious; (3) you have taken too long to address the violations; (4) you need to be on a formal schedule to address the violations; (5) you have been recalcitrant in addressing the violations; and/or (6) you are a chronic violator.

Why should I try to negotiate an administrative consent order with Ohio EPA?

- Negotiating administrative findings and orders ("Order") with the Ohio EPA avoids expensive and time-consuming litigation.
- Negotiation can be a swift resolution of the State's claims against you for the non-compliance.
- We can quickly identify any obstacle to agreement.
- Negotiation can minimize or prevent any intervention by the USEPA to address the violations.

Should I continue working with the District Office or local air agency inspector?

Yes, the District Office or local air agency inspector is the best person to work with you to resolve the technical aspects of the violations, and prepare an acceptable control plan and schedule for submission to the Agency. Central Office personnel will also be available to provide assistance.

What should I do now that I received the proposed administrative consent order?

You should review the enclosed Order and the summary of the penalty calculation. If you accept the enclosed Order as written, sign the Order and send it within two weeks to the staff attorney referenced in the Director's letter. If you cannot accept the Order as written, the Agency would like to meet with you to discuss your concerns. Please contact the designated staff attorney at (614) 644-3037 to arrange a meeting.

If I want to have a meeting, what should I do to prepare for it?

Generally, the most productive meetings occur when both parties come prepared to discuss all issues. The Order and correspondence from the District Office or local air agency inspector contain the Agency's position. Since you were not willing to agree to the Order as written, we need to know whether you: (1) disagree with the facts outlined in the Order; (2) are not able or willing to comply with the Order; or (3) have information you feel may mitigate the civil penalty settlement amount. Send the staff attorney a written summary of your issues within two weeks from the date of the Director's letter. Additionally, if you believe you are financially unable to pay the penalty, contact the staff attorney for a list of information we need to evaluate your ability to pay.

What will happen at the meeting?

During the meeting, we will respond to any information you have provided. We are willing to work with you to arrive at mutually agreed upon modifications to the Order. Except in the most complex cases, our goal is to complete all negotiations at the meeting. If we cannot agree at the meeting and we feel we are making adequate progress, we will hold our offer of settlement open. Thereafter, if resolution of the negotiations is not achieved within the time frame agreed to by the parties at the settlement meeting or if we feel we are not making adequate progress, the offer of settlement may be withdrawn, and we may consider other enforcement alternatives, including a referral to the Office of the Attorney General.

Why do I have to pay a civil penalty?

A civil penalty is necessary to deter future violations and to remove any economic advantage you may have realized from not complying with Ohio's regulations. Instead of a full cash payment, the Agency may be willing to accept a supplemental environmentally beneficial project ("SEP") that meets certain guidelines.

How did the DAPC arrive at the civil penalty settlement amount?

Ohio EPA relied on U.S. EPA's Air Civil Penalty Policy to calculate the penalty. The DAPC uses this Policy to ensure that we calculate penalties fairly and consistently and that the penalty is appropriate for the gravity of the violations. Enclosed is a summary of the DAPC's civil penalty settlement calculation. If you want a copy of the U.S. EPA's Air Civil Penalty Policy, contact the designated staff attorney at (614) 644-3037.

Who from Ohio EPA will be at the meeting?

Everyone necessary to resolve the matter will be at the meeting or available during the meeting to provide settlement authority. This includes the staff attorney, the District Office or local air agency inspector, and Central Office technical personnel.

Who should I bring to the meeting?

Similarly, you should bring anyone familiar with the issues as well as anyone who has the authority to settle this matter. You are welcome to be represented at this meeting by your attorney and your consultant.

News releases

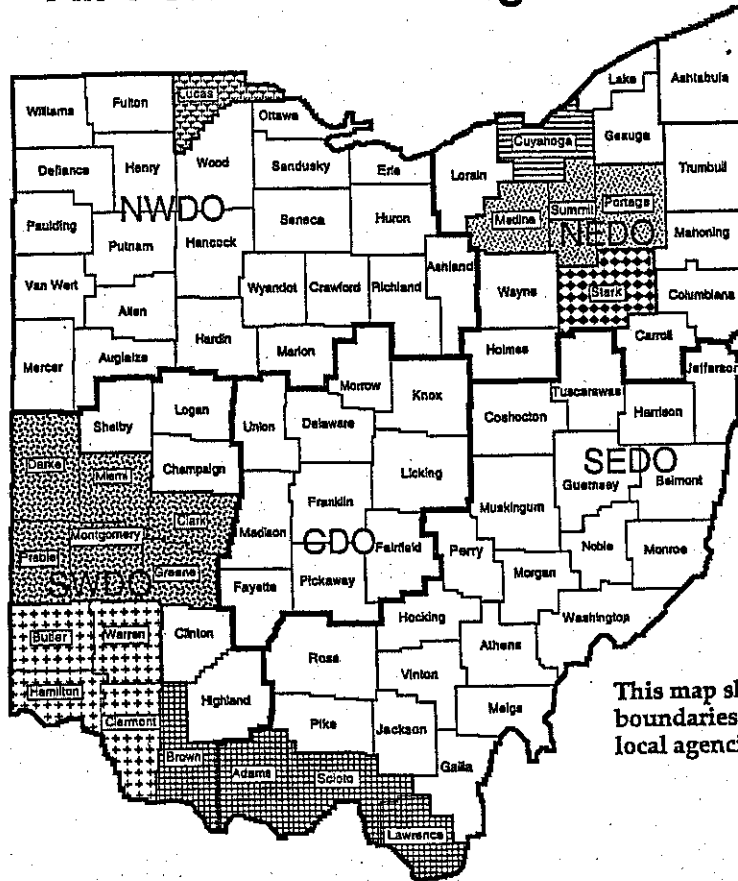
Please be aware that Ohio EPA may issue a news release to local media to inform the community about the settlement of this case, after all parties have signed it. As a public Agency whose primary mission is to promote compliance with environmental laws, we believe it is important to inform citizens about these types of actions. On average, we issue five or six enforcement-related news releases each month. You can read them at <http://www.epa.state.oh.us/pic/current.html>. If we prepare a news release, you will receive a courtesy copy 24 hours before it is released to the media. Although the Ohio EPA's news release represents our position, and it is not appropriate to negotiate the language in the news release with you, we do want to make sure the release is accurate. The one-day preview will be your opportunity to make the Public Interest Center aware of any factual errors you believe need to be corrected, and to prepare any statements you may wish to make to the media on your company's behalf.

District Office and local air agency addresses and phone numbers

See the following pages.

Air Permit Review Agencies

Division of Air Pollution Control
Ohio EPA, Central Office
(614) 644-2270



This map shows jurisdictional boundaries. Shaded areas represent local agencies within Ohio EPA districts.

Local Air Pollution Control Agencies



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Lynn Malcolm, Administrator
Akron Regional Air Quality
Management District
146 South High St. Room 904
Akron, Ohio 44308
(330) 375-2480 FAX#(330) 375-2402
e-mail: lynn_malcolm@ohio.epa.state.oh.us



07

Phillip H. Thompson, Director
Air Pollution Unit
Portsmouth City Health Dept.
740 Second St.
Portsmouth, Ohio 45662
(740) 353-5156 FAX#(740) 353-3638
e-mail: phillip_thompson@ohio.epa.state.oh.us



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Dan Aleman, Administrator
Air Pollution Control Division
Canton City Health Dept.
420 Market Ave. North
Canton, Ohio 44702-1544
(330) 489-3385 FAX#(330) 489-3335
e-mail: alemanda@laa.ci.canton.oh.us



04

Karen Granata, Administrator
City of Toledo
Division of Environmental Services
348 South Erie Street
Toledo, Ohio 43602
(419) 936-3015 FAX#(419) 936-3016
e-mail: karen_granata@ohio.epa.state.oh.us



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Cory Chadwick, Director
Dept. of Environmental Services
Air Quality Programs
250 William Howard Taft Road
Cincinnati, Ohio 45219-2660
(513) 946-7777 FAX#(513) 946-7778
e-mail: cory.chadwick@does.hamilton-co.org



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Michael Krzywicki, Project Coordinator
Dept. of Public Health & Welfare
Division of the Environment
1925 St. Clair Ave.
Cleveland, Ohio 44114
(216) 664-2324 FAX#(216) 664-4879
e-mail: michael_krzywicki@ohio.epa.state.oh.us



08

John Paul, Director
Regional Air Pollution Control Agency
Montgomery County Health Dept.
451 West Third Street
P.O. Box 972
Dayton, Ohio 45422
(937) 225-4435 FAX#(937) 225-3486
e-mail: paulja@rapca.org



District Offices

CDO

01

Isaac Robinson, APC Supervisor
Central District Office
3232 Alum Creek Drive
Columbus, Ohio 43207-3417
(614) 728-3778 FAX#(614) 728-3898
e-mail: isaac.robinson@epa.state.oh.us

SEDO

06

Kay Gilmer, APC Supervisor
Southeast District Office
2195 Front St.
Logan, Ohio 43138
(740) 385-8501 FAX#(740) 385-8490
e-mail: kay.gilmer@epa.state.oh.us

NEDO

02

Dennis Bush, APC Supervisor
Northeast District Office
2110 E. Aurora Rd.
Twinsburg, Ohio 44087
(330) 425-9171 FAX#(330) 487-0769
e-mail: dennis.bush@epa.state.oh.us

NWDO

03

Don Waltermeyer, APC
Northwest District Office
347 North Dunbridge Rd.
Bowling Green, Ohio 43402
(419) 352-8461 FAX#(419) 352-8468
e-mail: don.waltermeyer@epa.state.oh.us

SWDO

05

Phil Hinrichs, APC Supervisor
Southwest District Office
401 E. Fifth St.
Dayton, Ohio 45402-2911
(937) 285-6357 FAX#(937) 285-6249
e-mail: phil.hinrichs@epa.state.oh.us

BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

Ohio Cast Products, Inc.
2408 13th St., N.E.
Canton, OH 44705

:
:
:

Director's Final Findings
and Orders

PREAMBLE

It is agreed by the parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders ("Orders") are issued to Ohio Cast Products, Inc. ("Respondent") pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("Ohio EPA") under Ohio Revised Code ("ORC") §§ 3704.03 and 3745.01.

II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent and successors in interest liable under Ohio law. No change in ownership of the Respondent, or of the facility owned by Respondent (as hereinafter identified), shall in any way alter Respondent's obligations under these Orders.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 3704 and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA has determined the following findings:

1. Respondent owns and operates a gray iron foundry for the production of castings, which is located at 2408 13th St., N.E. in Canton, Stark County, Ohio. At this facility, Respondent melts scrap iron and steel to produce metal casting components. After casting, the excess metal is removed from the components and the surface areas are smoothed and shaped. Respondent employs a casting finishing process, identified by Ohio EPA as "emissions unit P002," for this purpose.

2. Emissions unit P002 is an "air contaminant source" as defined in Ohio Administrative Code ("OAC") Rules 3745-31-01(D) and 3745-15-01(C) and (W). "Particulate emissions," as defined in OAC Rule 3745-17-01(B)(11), are vented to a Wheelabrator baghouse for collection. Collected particulate matter in the hopper of the baghouse is periodically unloaded to collection bins for transport to a disposal site.

3. ORC § 3704.05(G) states that no person shall violate any order, rule, or determination of the Director of Ohio EPA issued, adopted, or made under ORC Chapter 3704.

4. ORC § 3704.05(C) states that no person who is the holder of a permit issued under division (F) or (G) of ORC § 3704.03 shall violate any of its terms or conditions.

5. OAC Rule 3745-15-07(A) states, in part, that the emission or escape into the open air from any source or sources whatsoever, of smoke, ashes, dust, dirt...or any other substance or combination of substances, in such manner or in such amounts as to endanger the health, safety, or welfare of the public, or cause unreasonable injury or damage to property, shall be considered a public nuisance, and it is unlawful for any person to cause, permit or maintain any such public nuisance.

6. OAC Rule 3745-17-08(B) states, in part, that no person shall cause or permit any fugitive dust source to be operated, or any materials to be handled, transported, or stored without taking or installing reasonably available control measures ("RACM"), as defined in OAC Rule 3745-17-01(B)(16), to prevent fugitive dust from becoming airborne, if the fugitive dust source is located within any of the areas identified in "Appendix A" of this rule and is not otherwise exempted from the requirements by this rule. The City of Canton in Stark County is listed in Appendix A.

7. Between February 28, 2001 and August 16, 2001, there have been several complaints received by the Canton City Health Department, Air Pollution Control Division ("Canton APCD"), Ohio EPA's contractual representative in Stark County, from nearby residents concerning excessive fugitive dust deposition originating from Respondent's facility. Each of these complaints was investigated by Canton APCD and a Notice of Violation was issued to Respondent on May 3, 2001. Based on its investigation of these complaints, Canton APCD concluded that Respondent violated OAC Rule 3745-15-07 and ORC § 3704.05(G).

8. Specifically, on February 28, March 5, 20, and 22, and August 16, 2001, Canton APCD conducted inspections of citizens' vehicles and property in the area of the facility and found rust-like particulate of a 'sandy' texture on the vehicles, roads, porches, and homes. It was observed that many vehicles in the area had particulate deposits on them, and the closer the vehicles were to Respondent's facility, the heavier the deposition appeared.

9. On February 28, 2001, a sample was taken from a car in the surrounding area. Additionally, on March 22, 2001, particulate samples were taken from the Pangborn baghouse serving other emissions units at the facility, one of the collection bags of the Wheelabrator, and from oxidized deposits on a stack of wooden pallets located near the Wheelabrator. An analysis of the samples performed on April 18, 2001, by the Hamilton County Department of Environmental Services, showed the presence of magnetic particles of iron and iron oxide as the main constituents. These constituents are typically found in the particulate emissions from foundry finishing operations. This additional evidence confirms the particulate matter deposition in the neighborhood originated from Respondent's facility and created a public nuisance through property damage. Therefore, Respondent violated OAC Rule 3745-15-07 and ORC § 3704.05(G).

10. Respondent was issued Permit to Install No. 15-1268 ("PTI") on October 30, 1996 for a modification to emissions unit P002. The PTI contains a general provision requiring air pollution control systems to be maintained regularly in accordance with good engineering practices in order to minimize air contaminant emissions.

11. Canton APCD inspectors conducted an unannounced inspection of Respondent's facility on March 22, 2001, and observed extensive damage to the hopper unloading system of the Wheelabrator baghouse, allowing visible particulate emissions of fugitive dust into the ambient air. The inspectors noticed that Respondent had tried to repair the damaged baghouse dust chute by using duct tape, which was not sufficient to control emissions. Canton APCD inspectors also observed escaping particulate matter from undamaged baghouse dust chutes along with metal grindings/shotblast wastes on the ground around the hopper unloading system. Dust also escaped during removal of full collection bags. This constituted a violation of Respondent's PTI and a violation of ORC § 3704.05(C). Further, Respondent's failure to use RACM to minimize or eliminate visible particulate emissions of fugitive dust from the hopper unloading system of the baghouse serving emissions unit P002 constituted a violation of OAC Rule 3745-17-08(B) and ORC § 3704.05(G).

12. On May 3, 2001, a NOV was sent to Respondent from Canton APCD for PTI violations, among other violations. Respondent initially replied with a letter dated May 9, 2001 and followed up with a letter dated May 22, 2001. In both letters, Respondent disagreed with the allegations in the NOV. Although Respondent disagreed with the NOV, in the May 9, 2001 letter, Respondent outlined the improvements it made or was planning to make to the baghouse facility to ensure compliance. These improvements included: replacing torn sections of corrugated plastic pipes, repairing trickle valves, adopting the use of a heavier "super-sack" to collect and transport the hopper dust, removing piles of accumulated dust and incorporating a regular schedule of sweeping the baghouse area, pouring new concrete floors for the new hopper enclosures, enclosing the hoppers and installing additional lighting, modifying and implementing a preventative maintenance and

malfunction abatement plan, and closing the potentially leaking slide-gate valve at the inlet to the Wheelabrator baghouse. Respondent also implemented a new "clean backyard" program for improved housekeeping and for removing production byproducts. Further, in a letter dated November 16, 2001, Respondent informed Canton APCD that it had installed enclosures on the Pangborn baghouse to help eliminate dust emissions. Prior to the implementation of these measures, Respondent was in violation of OAC Rule 3745-17-08(B) and ORC § 3704.05(G) for eight months, from March 22, 2001, the time of Canton APCD's first inspection, until November 2001, when Respondent installed proper controls to minimize or eliminate visible particulate emissions of fugitive dust at the facility.

13. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with the following Orders and their relation to benefits to the people of the State to be derived from such compliance.

V. ORDERS

The Director hereby issues the following Order:

Pursuant to ORC §3704.06, Respondent is assessed a civil penalty in the amount of Thirty-Seven Thousand and Five Hundred Dollars (\$37,500) in settlement of Ohio EPA's claim for civil penalties. Within thirty (30) days from the effective date of these Orders, Respondent shall pay Ohio EPA the amount of Thirty-Seven Thousand and Five Hundred Dollars (\$37,500). Payment shall be made by an official check made payable to "Treasurer, State of Ohio". The official check shall be submitted to Brenda Case at Ohio EPA, Office of Fiscal Administration, P.O. Box 1049, Columbus, Ohio 43216-1049, together with a letter identifying the Respondent and facility.

A copy of the official check shall be submitted to James A. Orlemann, Assistant Chief, Enforcement Section, or his successor, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, Ohio 43216-1049.

VI. TERMINATION

Respondent's obligations under these Orders shall terminate upon Ohio EPA's receipt of the official check required by Section V of these Orders.

VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to the

operations of Respondent's facility.

VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to the Respondent.

IX. MODIFICATIONS

These Orders may be modified by agreement of the parties. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

X. NOTICE

All documents required to be submitted by Respondent pursuant to these Orders shall be addressed to:

Air Pollution Control Division
Canton City Health Department
420 Market Avenue
Canton, Ohio 44702
Attention: Dan Aleman

and to:

Ohio Environmental Protection Agency
Lazarus Government Center
Division of Air Pollution Control
122 South Front Street, P.O. Box 1049
Columbus, Ohio 43216-1049
Attention: Thomas Kalman

or to such persons and addresses as otherwise may be specified in writing by Ohio EPA.

XI. RESERVATION OF RIGHTS

Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XII of these Orders.

XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only the violations specifically cited in these Orders, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Compliance with these Orders shall be a full accord and satisfaction for the Respondent's liability for the violations specifically cited herein.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such an appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless said Orders are stayed, vacated, or modified.

XIII. EFFECTIVE DATE

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

XIV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

IT IS SO ORDERED AND AGREED:

Ohio Environmental Protection Agency

Christopher Jones
Director

Date

IT IS SO AGREED:

Ohio Cast Products, Inc.

Signature

Date

Printed or Typed Name

Title

AIR CIVIL PENALTY WORKSHEET
for Ohio Cast Products, Inc.
(for settlement purposes only)

COMPONENT	SUBTOTAL	TOTAL	COMMENT
A. Benefit Component: (enter from attached computer calculation)		<u>\$0</u>	Any economic benefit from delayed compliance is negligible.
B. Gravity Component:			
1. Actual or possible harm:			
a. Amount above standard	<u>\$5,000</u>		Amount above standard (RACM) cannot be quantified. Therefore, the minimum penalty was assessed.
b. Toxicity of pollutant:	<u>\$0</u>		not applicable
c. Sensitivity of environment:	<u>\$5,000</u>		Attainment area for particulate matter
d. Length of time of violation:			
i. Failure to employ RACM for emissions unit P002 (violation of OAC Rule 3745-17-08)	<u>\$15,000</u>		Eight months from the time of Canton's first inspection that identified the violation (March 22, 2001) to the date the Respondent employed RACM (November 2001)
ii. Public nuisance (violation of OAC Rule 3745-15-07)	<u>\$5,000</u>		Five documented days when CLAA conducted inspections of citizens' vehicles and property (February 28, 2001, March 5, 2001, March 20, 2001, March 22, 2001 and August 16, 2001)
iii. Lack of maintenance to air pollution control system	<u>\$5,000</u>		March 22, 2001
2. Importance to regulatory scheme:			
	<u>\$15,000</u>		Failure to maintain control equipment (violation of PTI)
	<u>\$15,000</u>		Public nuisance (violation of OAC Rule 3745-15-07)

COMPONENT	SUBTOTAL	TOTAL	COMMENT
3. Size of violator:	<u>\$10,000</u>		Net worth of \$2 million (Reference: D&B)
Total gravity component:		<u>\$75,000</u>	
Preliminary deterrence amount: (sum of benefit and gravity components)		<u>\$75,000</u>	
C. Flexibility-Adjustment Factors:			
1. Degree of willfulness or negligence: (total gravity component times any augmentation percentage)	<u>\$0</u>		not applicable
2. Degree of cooperation: (total gravity component times any mitigation percentage)	<u>(\$7,500)</u>		10% mitigation for the degree of cooperation in remedying violations and implementing extensive preventative measures for the Wheelabrator and Pangborn baghouse at the facility.
3. History of noncompliance: (total gravity component times any augmentation percentage)	<u>\$7,500</u>		10% augmentation due to violations addressed by the Consent Order filed on September 9, 1999.
4. Ability to pay: (any mitigation amount)	<u>\$0</u>		not known
5. Other unique factors: (total gravity component times any mitigation or augmentation percentage)	<u>(\$37,500)</u>		50% mitigation for small amount of noncomplying mass emissions.
All augmentation (+) and mitigation (-) amounts added: (if negative, cannot exceed total gravity component)		<u>\$(37,500)</u>	
D. Administrative Component			
1. Installation of source without obtaining a Permit to Install	<u>\$0</u>		not applicable
2. Operation of source without obtaining a Permit to Operate	<u>\$0</u>		not applicable
Total Administrative Component		<u>\$0</u>	
E. Initial Minimum Settlement Amount: [preliminary deterrence amount + or - sum of flexibility adjustment factors plus administrative component (A + B + C + D)]		<u>\$37,500</u>	